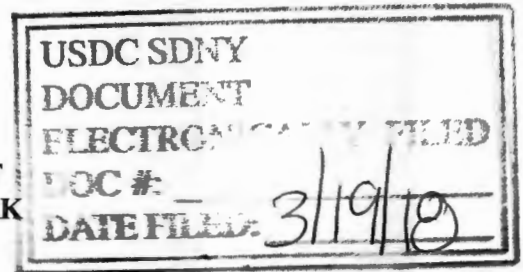


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



IN RE APPLICATION OF VEON LTD  
DIRECTING DISCOVERY PURSUANT TO 28  
U.S.C. § 1782

Misc. Action No.: 18-mc-94

**[PROPOSED] ORDER GRANTING VEON LTD'S APPLICATION  
FOR AN ORDER UNDER 28 U.S.C. § 1782 TO  
TAKE DISCOVERY IN AID OF FOREIGN PROCEEDINGS**

Upon consideration of the Application of VEON Ltd. ("VEON"), for an Order to Take Discovery Pursuant to 28 U.S.C. § 1782 (the "Application"), the Memorandum of Law, the supporting declarations of Ms. Kiera Gans, an attorney with DLA Piper LLP in New York, New York, Mr. Stuart Terence Dutson, an attorney with Simmons & Simmons LLP in London, United Kingdom, Mr. Louis Cassar Pullicino, an attorney with Ganado Advocates in Valletta, Malta, and Mr. Luke Ryan Stockdale, an attorney with Maples and Calder in George Town, Cayman Islands, and the documents attached thereto, I find that the Application is appropriate.

Therefore, it is HEREBY ORDERED THAT:

1. VEON's application for discovery from The Bank of New York Mellon Corporation; JPMorgan Chase, N.A.; Deutsche Bank Trust Co. Americas; Bank of China; Barclays Bank PLC; BNP Paribas USA; Citibank N.A.; The Clearing House Payments Company LLC; Commerzbank AG; HSBC Bank USA, N.A.; Société Générale S.A.; Standard Chartered Bank USA; UBS AG; Wells Fargo Bank, N.A.; Beltone Financial USA, LLC and Auerbach Grayson and Company LLC (together, the "Discovery Targets") pursuant to 28 U.S.C. § 1782 is GRANTED;

2. VEON is authorized, pursuant to 28 U.S.C. § 1782, to take discovery from the Bank Discovery Targets, relating to the issues identified in this application, including (a) issuing subpoenas for the production of documents by Discovery Targets in substantially the form attached to Ms. Gans' Declaration as Exhibit A-1, Exhibit A-2 and Exhibit A-3; and (b) issuing

additional subpoenas for the production of documents from the Discovery Targets as may be appropriate and consistent with the Federal Rules of Civil Procedure;

3. The Respondents are directed to comply with such subpoenas in accordance with the Federal Rules of Civil Procedure and the Rules of this Court; and

4. Counsel for VEON is appointed to issue, sign and serve such subpoenas upon the Discovery Targets.

So ordered this 16<sup>th</sup> day of March, 2018.

  
United States District Judge